

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

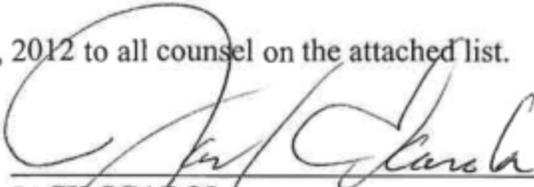
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

**NOTICE OF SERVING ANSWERS TO PLAINTIFF'S THIRD SET
OF INTERROGATORIES TO DEFENDANT/COUNTER-PLAINTIFF
BRADLEY J. EDWARDS**

COMES NOW the Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, and hereby files this Notice with the Court that Answers to Plaintiff's Third Set of Interrogatories propounded by the Plaintiff, Jeffrey Epstein, on December 9, 2011, have been furnished to the attorney for the Plaintiff.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by Fax and U.S. Mail this 6th day of January, 2012 to all counsel on the attached list.



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ANSWERS TO PLAINTIFF'S
THIRD SET OF INTERROGATORIES TO BRADLEY J. EDWARDS

1. Identify each and every fact that supports the allegations set forth in your Second Amended Counterclaim, by providing:
 - a. a detailed description of the damages you allege you have suffered, including, but not limited to, those you claim have resulted in
 - (1) injury to your reputation, and
 - (2) interference in your professional relationships; and
 - b. a detailed description of the special damages you allege that you have suffered, including, but not limited to:
 - (1) the loss of the value of your time diverted from your professional responsibilities, and
 - (2) the cost of defending claims against you in this lawsuit.

ANSWER:

The identification of "each and every fact that supports" specific allegations would require the disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege. Subject to and without waiving that privilege, Bradley Edwards has described the special damages he has sustained and will continue to sustain in the future in his currently pending counterclaim. He has been falsely accused of immoral, unethical, and illegal conduct impugning his professional integrity, his professional competence, and his fitness to practice law. Such accusations are defamatory per se and Florida law conclusively presumes the damage that inevitably arises from such defamation. The false accusations have been disseminated repeatedly throughout not only the South Florida legal community but nationally and internationally.

In addition, Bradley Edwards has been obliged to divert time, effort, and attention from the productive practice of his profession to defend against the tortuous misconduct of Epstein. Every minute diverted from his professional pursuits impeded his ability to advance the claims and interests of existing clients and precluded him from undertaking other and additional responsibilities. Time records made available in response to Epstein's Request to Produce detail (at a minimum) the extent of the diversion Mr. Edwards has suffered. Cost invoices for expenditures incurred in defending against Epstein's misconduct have also been made available

in response to Epstein's Request to Produce. Those damages are ongoing and continuing in nature.

2. Explain in detail how your reputation has been injured as a direct result of this action against you from the filing of this action to the present. With specificity, identify the following:

- a. Your alleged reputation prior to the filing of this action;
- b. Any and all persons who have made statements about your reputation after the filing of this action;
- c. Any and all communications, whether verbal or written, made about your reputation; and
- d. The date, manner, and substance of communications in which said statements have been made about your reputation.

ANSWER:

See above.

- a. Excellent
- b. None are presently known except Epstein and his numerous lawyers including the attorneys presently engaged in advancing Epstein's malicious prosecution of Edwards and his extortionate abuse of process.
- c. See 2b above.
- d. See the pleadings, filings, and on-the-record statements made in this case and the RRA bankruptcy proceedings.

3. Explain in detail how the filing of this action against you has interfered with your professional relationships and for each such relationship:

- a. identify its nature and the person with whom you have or had the relationship;
- b. specify exactly how the relationship has been interfered with;
- c. identify each person with knowledge of the interference; and
- d. identify actual damages as a result of such interference.

ANSWER:

See answer to #1 above. Persons with knowledge of the interference include the parties to this action, all present and prior attorneys of record, all persons on the certificate of service of Epstein's Motion to Depose Rothstein filed in the RRA bankruptcy proceedings, all attorneys, judges, and observers in Court on every occasion that

argument has been presented in support of Epstein's spurious claims against Edwards, all persons exposed to media coverage of Epstein's spurious claims against Edwards.

Actual damages sustained by Edwards include:

- the costs incurred in defending against Epstein's outrageous misconduct;
- the value of Edwards' diverted time and attention;
- the value of compensation for the injury to Edwards' professional reputation as liquidated by a jury.

4. Identify each and every witness that has knowledge of the damages you seek to recover in this action, including but not limited to your employer, your partners, your family members, associates, colleagues, referral sources, and clients and, for each, describe the nature of his or her knowledge.

ANSWER:

Steve Jaffe, Gary Farmer, Seth Lehrman have knowledge of the extent to which Bradley Edwards' time and attention were diverted by Epstein from gainful professional pursuits, Bradley Edwards' professional reputation, competence, integrity, and character.

Former Federal Judge Paul Cassell has knowledge of the same matters described above. Earleen Cote, Esq. has knowledge of the same matters described above.

5. Explain the basis for your claim that your reputation has been injured by the allegations against you in this action.

ANSWER:

Defamation per se.

6. Explain the method by which you have distinguished injury to your reputation resulting directly from allegations against you in this action from injury to your reputation resulting from your having been a partner in the defunct firm of Rothstein Rosenfeldt & Adler.

ANSWER:

Epstein's malicious, unsupported, unsupportable, false accusations of Bradley Edwards' knowing involvement and active participation in a massive Ponzi scheme singled Mr.

Edwards out from among all other innocent RRA employees. Those accusations were the only source falsely linking Bradley Edwards to Rothstein's criminal enterprise, and absent those allegations there is no basis to believe that Bradley Edwards' impeccable professional reputation would have been tarnished by his brief employment with Rothstein Rosenfeldt & Adler. Indeed, the vast majority of RRA employees were presumed innocent and have escaped any taint from their employment with the firm.

7. Identify all fees and costs that you have incurred for the defense of this action against you.

ANSWER:

See Bradley Edwards' contemporaneous production.

8. If you have a written engagement agreement with the firm of Searcy Denney Scarola Barnhart & Shipley, P.A. describe the date of the agreement, the scope of services and the terms on which your counsel are to be compensated.

ANSWER:

See Bradley Edwards' contemporaneous production.

9. If you do not have a written engagement agreement with the firm of Searcy Denney Scarola Barnhart & Shipley, P.A., describe the terms of your oral representation agreement, the scope of services and the terms on which your counsel are to be compensated.

ANSWER:

N/A

10. Identify any other attorney and firm with whom you have any relationship in connection with your defense of this action.

ANSWER:

None

11. If you (or another on your behalf) have paid any legal fees and costs incurred for the defense of this action, provide the amounts paid and the date of each payment.

ANSWER:

See Bradley Edwards' contemporaneous production.

12. State, by week or month, the amount of hours that you devoted to your professional work since the filing of this action against you (in 2009, 2010 and 2011) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

ANSWER:

Unknown, although Bradley Edwards estimates that in the ordinary course of his work he devotes approximately 60 hours per week to professional activities. This total regularly increases immediately prior to and during trials.

13. State, by week or month, the amount of hours that you have devoted to your professional work during the two years prior to the filing of this action against you (in 2007 and 2008) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

ANSWER:

Unknown, although Bradley Edwards estimates that in the ordinary course of his work he devotes approximately 60 hours per week to professional activities. This total regularly increases immediately prior to and during trials.

14. State the amount of gross income that you received from providing services as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011 and identify the source of that income (including the payor of the same).

ANSWER:

Objection. Irrelevant, immaterial, not reasonably calculated to lead to the discovery of admissible evidence and an unwarranted invasion of Bradley Edwards' right to economic privacy.

15. State the amount of gross income that you received from the provision of goods or services other than while acting as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011 and identify the source of that income (including the payor of the same).

ANSWER:

Objection. Irrelevant, immaterial, not reasonably calculated to lead to the discovery of admissible evidence and an unwarranted invasion of Bradley Edwards' right to economic privacy.

16. State the amount of hours that you have devoted to pro bono work for the years 2007, 2008, 2009, 2010 and 2011 and substantiate your answer with the names of the cases or causes for which you provided such service.

ANSWER:

Objection. Irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

17. You claim damages for emotional distress, embarrassment, and mental anguish as a result of this action against you. Have you sought professional medical or psychological services? If so,

- a. identify each provider of such services;
- b. state the dates during which you received treatment or assistance for such services; and
- c. state the amount of money you have paid for such services.

ANSWER:

No.

18. If you have not sought professional medical or psychological services, please explain why.

ANSWER:

I have managed to deal with the emotional and psychological stress without professional assistance and have preferred to avoid the potential stigma that sometimes attaches to treatment for emotional and psychological issues.

19. If you claim to have suffered any loss of income, wages, or other remuneration as a result of the claims made against you in this action, describe in detail

- a. the nature of the lost income, whether by wages or other remuneration (e.g., loss of clients, loss of earnings for hours engaged in the practice of law, etc.);
- b. the amount of lost income, whether by wages or other remuneration, for each period for which you typically receive the above (e.g., if you bill or otherwise keep track of legal services you provide by the hour, the number of hours which you were unable to perform such services for each month) since the filing of this action;
- c. the duration of the loss, i.e., the date the loss commenced and concluded;
- d. the basis for determining the loss, i.e., identify the specific client and matter; and
- e. the method used in calculating your loss of income, whether by wages or other remuneration, for the period you have claim to have suffered damages.

ANSWER:

See Bradley Edwards' contemporaneous production.

20. If you are claiming that you have suffered loss of future earning capacity as a result of the allegedly wrongful conduct, describe with specificity:

- a. the duration of the lost future earning capacity;
- b. the amount of the lost future earning capacity, and
- c. the basis for your calculation.

ANSWER:

Undetermined at this time.

21. If you are claiming to have lost business or employment opportunities as a result of the allegedly wrongful conduct of the plaintiff, describe each with specificity and, for each, state the amount of money damages you seek to recover.

ANSWER:

Undetermined at this time.

22. Describe the method used in calculating your loss of future earnings.

ANSWER:

N/A

23. With respect to each alleged lost business opportunity, please state for each the following:

- a. the name and address of the employer, client, attorney or entity who offered or presented the business opportunity that you claim was lost;
- b. the nature and scope of work involved in the lost business opportunity;
- c. the amount of compensation or remuneration you estimated that you would earn or be paid had you undertaken the opportunity and the basis for that estimation; and
- d. the date you determined that you had lost the business opportunity.

ANSWER:

N/A

24. State each instance in which you have spoken to or communicated with the press or any other media representative relating to Plaintiff Jeffrey Epstein. Provide the identity of each contact, the date of the contact, and a description of the communication.

ANSWER:

Objection. Attorney work product privilege except to the extent that Bradley Edwards is identified as a source of information in published reports which are as easily available to Jeffrey Epstein as to Bradley Edwards through internet searches.

25. Identify the confidential source(s) listed on your Privilege Log in this case dated February 23, 2011.

ANSWER:

Objection. Attorney-work product.

26. Identify the legal basis for including a confidential source in your Privilege Log.

ANSWER:

Attorney work product privilege

27. Provide an explanation for your belief that law enforcement is still investigating the Plaintiff/Counter-Defendant Jeffrey Epstein. Identify contacts with government/law enforcement, media, other attorneys, or anyone else from which you claim to form this belief, including the names, dates, substance of communication, etc.

ANSWER:

Objection. Attorney work-product and statutorily restricted communications with law enforcement and prosecutorial authorities. Irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

28. Identify the basis for your claim that others still persist in prosecuting claims against the Plaintiff/Counterdefendant Jeffrey Epstein. Identify the persons still prosecuting claims against the Plaintiff/Counterdefendant or with knowledge of the persons still prosecuting claims against him, including names, dates of contact with such persons, substance of communication, etc.

ANSWER:

Objection. Attorney work-product and statutorily restricted communications with law enforcement and prosecutorial authorities. Irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

29. Provide support for your claims in Paragraphs 9 and 25 of the Second Amended Counterclaim in which you allege the sole purpose of filing civil claims was never to recover monetary damages, that Plaintiff/Counterdefendant Jeffrey Epstein knew he never suffered monetary damages, that he knowingly asserted baseless and unsupported claims, etc.

ANSWER:

See Bradley Edwards' Motion for Summary Judgment and attachments.

30. Identify all clients and list all payments made to clients in connection with their cases against the Plaintiff/Counter-Defendant Jeffrey Epstein.

ANSWER:

Objection. Irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. However, to the extent deemed relevant, since Epstein directly settled the claims and made the payments, the information requested is readily available to him.

31. Identify all third parties (non-clients) who received or made payments in connection with the client cases or purported client cases against the Plaintiff/CounterDefendant Jeffrey Epstein and with specificity: (1) explain the relationship of such third parties; (2) list the payments made to or by each; and (3) list the date of payments and purpose of payments. Your answer should include without limitation all investigators, witnesses, referring persons, referring attorneys, outside counsel, outside experts. It should also include any and all payments made to or by investors in any of the client cases against the Plaintiff/CounterDefendant Jeffrey Epstein or payments made by or to any other person in connection with the client cases.

ANSWER:

Objection. Irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

32. Identify all attorneys who worked on the client cases against Plaintiff/CounterDefendant Jeffrey Epstein, including, but not limited to, the attorneys formerly at Rothstein Rosenfeldt & Adler; the attorneys at Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL; outside attorneys and referring attorneys.

ANSWER:

Bradley Edwards, Paul Cassell, Matt Weissing, Steve Jaffe and Bill Berger rendered substantive services in the prosecution of claims against Jeffrey Epstein. Russell Adler was in attendance at multiple depositions but was not an active participant.

33. Identify all members of support staff, paralegals, secretaries, investigators, etc. who worked on client cases against the Plaintiff/CounterDefendant Jeffrey Epstein, including but not limited to, Bradley Edwards' office; the attorneys formerly at Rothstein Rosenfeldt & Adler; the office of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL; and offices of outside attorneys and referring attorneys.

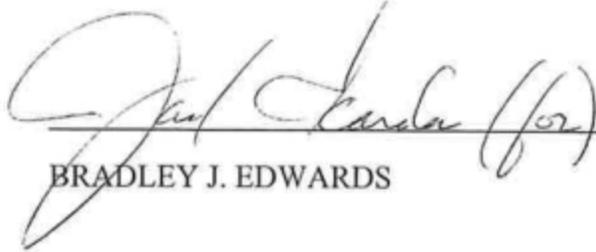
ANSWER:

Shawn Gilbert, Wayne Black, Jacquie Johnson, Beth Williamson, Susan Sterling, Mike Fisten, Pat Roberts, Pat Diaz

34. Identify any agreements, proposals, offers, discussions, negotiations, etc. related to the sale or development of any movie, book, or other rights or similar deals.

ANSWER:

None


BRADLEY J. EDWARDS

STATE OF FLORIDA)

PALM BEACH
COUNTY OF BROWARD)

The foregoing instrument was acknowledged before me this 6th day of January, 2012
by JACK SCARICA ESQ. for Bradley J. Edwards, who is personally known to me or who has produced
_____ (~~type of identification~~) as ~~identification~~ and who did/did
not take an oath.


Notary Public
State of Florida at Large
My Commission expires:
Commission No:



IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

PLAINTIFF'S RESPONSE TO REQUEST TO PRODUCE

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned attorney and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby respond to Plaintiff/Counterdefendant, Jeffrey Epstein's, Request to Produce dated December 9, 2011 as follows:

1. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
2. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
3. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

4. Objection. The identification of documents “that tend to support” a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

5. Objection. The identification of documents “that tend to support” a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards’ counsel at any mutually convenient time determined by prior arrangement.

6. The only responsive documents are:

- the original and amended Complaints in this action
- Epstein’s Motion to Depose Rothstein (with attachments and certificate of service) filed in the RRA bankruptcy proceedings
- bankruptcy filings and hearing transcripts all of which are already in the possession of Epstein and his counsel

7. None

8. Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards’ counsel at any mutually convenient time determined by prior arrangement.

9. Responsive documents are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

10. None

11. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

12. None

13. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

14. None

15. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

16. Objection. Attorney work product privilege

17. Objection. Attorney work product privilege

18. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

19. Objection. Attorney work product privilege except to the extent that Bradley Edwards is identified as a source of information in published reports which are as easily available to Jeffrey Epstein as to Bradley Edwards through internet searches.

20. None

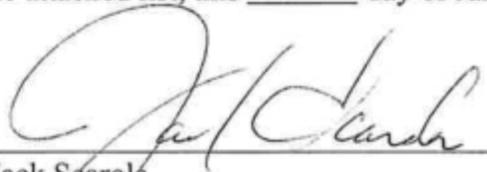
21. None

22. None except to the extent that pending Victims Rights Act proceedings fall within the description of this request. Pleadings in that matter are public records readily available to Jeffrey Epstein.

23. See Bradley Edwards' Motion for Summary Judgment and attachments thereto and all pleadings and filings in the state and federal criminal proceedings against Epstein and in each of the civil claims brought against and settled by him—all of which are already in the possession of Epstein and/or the members of the various law firms who do and have represented him.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and U.S. Mail to all Counsel on the attached list, this 6th day of January, 2012.



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Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

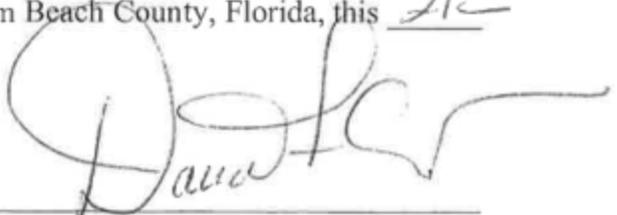
ORDER ON PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
OBJECTIONS TO BRADLEY J. EDWARDS'
REQUEST TO PRODUCE DATED 10/28/11

THIS CAUSE having come to be considered upon the Objections of Plaintiff/Counter-Defendant, JEFFREY EPSTEIN'S objections to the Request to Produce served by Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, and the Court having reviewed the file and being fully advised in the premises, it is hereby,

ORDERED and ADJUDGED: The objections are overruled

except as to privilege. The Plaintiff shall file

DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, this 21st
day of Dec., 2011.



DAVID F. CROW
CIRCUIT JUDGE

Copies have been furnished to all counsel on the attached counsel list.

a complete response within 20 days together with
a privilege log.

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IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiffs.

COPY
RECEIVED FOR FILING

JAN 10 2012

SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
MOTION FOR ENLARGEMENT OF TIME TO COMPLY WITH COURT'S
DECEMBER 21, 2011 ORDER ON OBJECTIONS TO DISCOVERY REQUESTS**

Plaintiff/Counter-Defendant JEFFREY EPSTEIN ("Epstein"), by and through undersigned counsel and pursuant to the Florida Rules of Civil Procedure, hereby moves for an enlargement of time to respond to this Court's December 21, 2011 Order on Epstein's Objections to Bradley J. Edwards' Request to Produce Dated 10/28/11. The grounds for this Motion are as follows:

1. At a hearing on this matter held on December 21, 2011, this Court considered the objections of Epstein to Defendant/Counter-Plaintiff BRADLEY J. EDWARDS' ("Edwards") Request to Produce Dated 10/28/11.
2. The Court overruled the objections except as to privilege and directed the Plaintiff to file a complete response within 20 days, together with a privilege log. A copy of the Order is attached hereto as Exhibit 1.
3. Counsel for Plaintiff certifies that his office did not receive this Order until the afternoon of January 6, 2011, thereby giving him less than 3 business days to comply with the Order.

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